

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 20-00354-01-CR-W-HFS
	)	
ANGELO D. JONES,	)	
	)	
Defendant.	)	

**MEMORANDUM OF MATTERS DISCUSSED AND  
ACTION TAKEN AT PRETRIAL CONFERENCE**

**PENDING CHARGE:** On December 15, 2020, the Grand Jury returned a two-count Indictment charging Defendant Angelo D. Jones with being a felon in possession of a firearm and ammunition (Count One).<sup>1</sup>

The following matters were discussed and action taken during the pretrial conference:

**TRIAL COUNSEL:**

Government: Sean T. Foley and Jeffrey Quinn McCarther  
Case Agent: Det. Nick Horine, KCPD/Task Force  
Defense: Sarah Grace Hess  
Paralegal: Alex Gleason

**OUTSTANDING MOTIONS:** No outstanding motions.

**TRIAL WITNESSES:**

Government: 10 with stipulations; 12 without stipulations  
Defendant: 3 witnesses, including the Defendant

**TRIAL EXHIBITS:**

Government: approximately 70 exhibits  
Defendant: approximately 10 exhibits

**DEFENSES:**

---

<sup>1</sup> Co-Defendant Darnell E. Rhone pled guilty to Count Two of the Indictment, on August 23, 2022, and is awaiting sentencing.

**POSSIBLE DISPOSITION:**

(X) Definitely for trial; ( ) Possibly for trial; ( ) Likely a plea will be worked out

**TRIAL TIME: 3 ½ days total**

Government's case including jury selection: 3 day(s)

Defendant: 1/2 day(s)

**STIPULATIONS:** The parties anticipate stipulations as to prior convictions and interstate nexus. The parties are in discussion regarding other stipulations.

**UNUSUAL QUESTIONS OF LAW:** None.

**FILING DEADLINES:**

**Witness and Exhibit List**

Government: None filed. **Due on or before January 31, 2023.**

Defendant: None filed. **Due on or before January 31, 2023.**

**Counsel are requested to list witnesses in alphabetical order on their witness list.**

**Exhibit Index, if required by the District Court, Voir Dire, Jury Instructions: Due on or before February 8, 2023.**

**Please Note:** Jury instructions must comply with Local Rule 51.1

**Motion in Limine: Due on or before February 8, 2023.**

**TRIAL SETTING:** Criminal jury trial docket set for February 13, 2023.

**Please note:** The Government requests the first week as counsel has a conflict on the second week. Defense is available both weeks.

**IT IS SO ORDERED**

*/s/ Lajuana M. Counts*

LAJUANA M. COUNTS

UNITED STATES MAGISTRATE JUDGE